

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

| | | |
|-----------------------|---|---------------------|
| NINA SHAHIN, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | C.A. No. 06-289 GMS |
| |) | |
| STATE OF DELAWARE |) | |
| DEPARTMENT OF FINANCE |) | |
| |) | |
| Defendant, |) | |

**PLAINTIFF'S MOTION TO AMEND THE ORIGINAL CLAIM AND TO
ENLARGE THE SCOPE OF THE LAWSUIT TO INCLUDE OTHER
INCIDENTS OF DISCRIMINATION**

COMES NOW Plaintiff, Nina Shahin, and respectfully moves this Honorable Court to enter an Order Granting an amendment of original complaint and enlargement of scope of the lawsuit pursuant to Fed. R. Civ. P. (15)(c) to include 10 additional incidents of discrimination alleged by the plaintiff that are at different stages either at Equal Employment Opportunity Commission, under investigation at the State of Delaware, Department of Labor, Division of Industrial Affairs or have not been even filed as discrimination claims yet. The incidents that are requested to be included and the stage of each incident are listed at the Exhibit A attached to this Motion.

PLAINTIFF

September 11, 2006


NINA SHAHIN

103 Shinnecock Rd.
Dover, DE 19904
(302)678-1805



EXHIBIT APENDING CASES

| Position/Division | Date Applied | Dated Denied | Current Status |
|---|--------------|---------------------|---|
| 1. Bank Examiner I/ Bank Commissioner | 09/30/2005 | 11/30/2005 | EEOC, applied for a Fed. Right to Sue (FRtS) on 05/09/2006 |
| 2. Asst. Dir. of Fin. | 02/09/2006 | 03/21/2006 | EEOC, applied for FRtS Mgmt/Del.DOT on 08/31/2006 |
| 3. State Acc. IV/Div. Of Accounting | 03/22/2006 | 05/05/2006 | EEOC, applied for FRtS on 08/31/2006 |
| 4. Tax Auditor I/Div. Of Revenue | 09/27/2005 | 02/15/2006 | Dept. of Labor/Division of Industrial Affairs (under Investigation) |
| 5. Tax Auditor I/Div. Of Revenue (second application) | 01/30/2006 | nothing received | Dept. of Labor claims that the previous complaint was enlarged to include this one though it does not have a # |
| 6. State Acc. III/Div. Of Accounting | 09/27/2005 | 12/09/2005 | Dept. of Labor/Div. of Ind. Affairs, under investigation |
| 7. Tax Auditor II/ Div. of Revenue | 02/09/2006 | 06/06/2006 | Since Dept. of Labor declined to accept any more of my complaints I wrote about this incident in my letter of June 20, 2006 to the Dept. and it is not clear whether it is included in the "enlarged" investigation |

| | | | |
|--|------------|------------|---|
| 8.State Acc.V/Div. Of Accounting | 03/13/2006 | 06/12/2006 | Dept. of Labor claims that this position is included in the "enlarged" investigation; no # was assigned though. |
| 9.Accountant II/ Div. of Accounting | 05/18/2006 | 08/14/2006 | The complaint has not been filed yet |
| 10.Accountant/Del. DOT | 06/23/2006 | 08/25/2006 | Was graded at 98% but was not called for an interview which is discriminatory; complaint has not been filed as yet. |

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| Plaintiff, |) | |
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| vi. |) | C.A. No. 06-289 GMS |
| |) | |
| STATE OF DELAWARE |) | |
| DEPARTMENT OF FINANCE |) | |
| |) | |
| Defendant, |) | |

ORDER

AND NOW, this ____ day of _____, 2006, Plaintiff's Motion for Amendment and Enlargement of the Original Complaint having been heard and considered by the Court, it is hereby **ORDERED** that the Motion is **GRANTED** and the defendant shall file a responsive pleading to the Amended Complaint on or Before **October 12, 2006**.

J.

CERTIFICATE OF MAILING AND/OR DELIVERY

The undersigned certifies that on September 12, 2006, she caused the attached *Plaintiff's Motion to Amend the Original Claim and to Enlarge the Scope of the Suit to Include Other Incidents of Discrimination* to be delivered to the following persons in the form and manner indicated:

NAME AND ADDRESS OF RECIPIENTS:

1. **U.S. District Court**
844 King Street
U.S. Courthouse
Wilmington, DE 19801

MANNER OF DELIVERY:

Original and a copy by certified mail with return receipt

2. **Stephani J. Ballard, # 3481**
Deputy Attorney General
Department of Justice
State of Delaware
Carvel State Office Building
820 North French Street, 6th fl.
Wilmington, DE 19801
Attorney for Defendant

MANNER OF DELIVERY:

Two true copies by first class mail, postage prepaid